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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**-against-**

**LAWRENCE E. PENN, III,  
ALTURA ST. MICHAEL EWERS,  
CAMELOT ACQUISITIONS SECONDARY  
OPPORTUNITIES MANAGEMENT, LLC,  
THE CAMELOT GROUP INTERNATIONAL, LLC,  
and  
SSECURION LLC,**

**Defendants,**

**-and-**

**A BIGHOUSE FILM AND PHOTOGRAPHY  
STUDIO LLC,**

**Relief Defendant.**

**14 Civ. 0581  
ECF Case**

**ORDER DIRECTING FIRST REPUBLIC BANK  
TO TURN OVER FROZEN FUNDS IN PARTIAL SATISFACTION OF JUDGMENTS**

The Plaintiff Securities and Exchange Commission (the “Commission”) having moved for a turnover order directed to non-party First Republic Bank (“First Republic”) with respect to certain accounts, and for the release of certain other accounts from the asset freeze imposed and continued by Orders of this Court issued on January 30, 2014 (Docket Entry 2), July 11, 2014 (Docket Entry 56), October 1, 2018 (Docket Entry 300) and/or March 15, 2020 (Docket Entry 335) (collectively, the “Asset Freeze Orders”), and the Court having considered the papers submitted on such motion, and it appearing that such an order should be issued, it is hereby:

**I.**

**ORDERED** that the Commission shall serve a copy of this Order upon First Republic, Lawrence E. Penn III (“Penn”) (in his capacity as owner of Camelot Acquisitions Secondary Opportunities GP, LLC (“CASO GP”)), Camelot Group International (“CGI”), Camelot Acquisitions Secondary Opportunities Management, LLC (“CASO Management”), CM Growth Capital Partners, L.P. f/k/a Camelot Acquisitions Secondary Opportunities Offshore, LP (“CASO Offshore”), and a representative of each of the persons who invested in CASO Co-Invest A, LLC (“CASO Co-Invest”). Service may be made by electronic mail upon the consent of the receiving party, by overnight delivery service such as United Parcel Service, or by certified mail, return receipt requested.

**II.**

**FURTHER ORDERED** that the account balances turned over pursuant to Sections III, IV and V of this Order shall be paid to the Commission in three separate payments, each specifying the judgment to which such payment relates, by one of the following means:

- a. Electronically, wherein the Commission will provide detailed ACH transfer/Fedwire instructions upon request made to (202) 551-7940 and/or [Disgorgement-Penalty@sec.gov](mailto:Disgorgement-Penalty@sec.gov);
- b. Direct payment from a bank account via Pay.gov through the Commission’s website at <http://www.sec.gov/about/offices/ofm.htm>; or
- c. By certified check, bank cashier’s check, or United States postal money order, made payable to the “Securities and Exchange Commission” and setting forth the title and civil action number of this action (“*SEC v. Penn, et al.*, 14-cv-0581”) and the name of this Court (“United States District Court, Southern

District of New York”); and specifying the judgment to which such payment relates. The funds may be hand-delivered or mailed to:

Enterprise Services Center  
Accounts Receivable Branch  
HQ Bldg., Room 181, AMZ-341  
6500 South MacArthur Boulevard  
Oklahoma City, OK 73169

First Republic shall simultaneously transmit photocopies of evidence of payment and case identifying information to SEC attorneys Karen E. Willenken and Elizabeth R. Goody, by electronic mail to [WillenkenK@sec.gov](mailto:WillenkenK@sec.gov) and [GoodyE@sec.gov](mailto:GoodyE@sec.gov).

### III.

**FURTHER ORDERED** that within 14 days from receipt of this Order, First Republic shall turn over to the Commission all funds remaining in CASO Management’s account with account number ending in 1992. Such payment shall specify that payment is made pursuant to this Order in satisfaction of the Judgment entered against CASO Management entered on April 1, 2020.

### IV.

**FURTHER ORDERED** that within 14 days from receipt of this Order, First Republic shall turn over to the Commission all funds remaining in CGI’s account with account number ending in 3170. Such payment shall specify that payment is made pursuant to this Order in satisfaction of the Judgment entered against CGI on April 1, 2020.

### V.

**FURTHER ORDERED** that within 14 days from receipt of this Order, First Republic shall turn over to the Commission all funds remaining in the accounts of CASO GP, CASO Co-Invest and CASO Offshore, with account numbers ending in 1984, 9356 and 6930. Such

payment shall specify that payment is made pursuant to this Order in satisfaction of the Judgment entered against Lawrence E. Penn III entered on October 1, 2018.

**VI.**

**FURTHER ORDERED**, that by making the payments required by Sections III, IV and V of this Order, First Republic shall be forever released and discharged from any liability with respect to such funds to Penn or CGI, or to any person or entity claiming a right in and to such funds derived from Penn or CGI, and from any liability with respect to such funds as to the Commission.

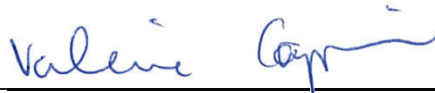
**VII.**

**FURTHER ORDERED** that within 21 days from receipt of this Order, First Republic shall release any restrictions previously imposed, pursuant to the Asset Freeze Orders, on the use of any accounts in the names of, or controlled or owned by, any of the Defendants, if such accounts are for credit cards or lines of credit, or have zero or negative balances. First Republic may restore the account(s) to normal operation or, at its election, close the account(s).

**VIII.**

**FURTHER ORDERED** that this Court shall retain jurisdiction to enforce compliance with this Order.

Dated: March 31, 2021



HON. VALERIE E. CAPRONI  
UNITED STATES DISTRICT JUDGE